

No. PD- 6546-20

KEDREEN MARQUE PUGH,	§	IN THE COURT OF
<i>Appellant-Respondent</i>	§	COURT OF CRIMINAL APPEALS
	§	11/23/2020
	§	DEANA WILLIAMSON, CLERK
v.	§	CRIMINAL APPEALS
	§	
STATE of TEXAS,	§	
<i>Appellee-Petitioner</i>	§	AUSTIN, TEXAS

STATE'S MOTION FOR EXTENSION OF TIME TO FILE
BRIEF ON THE MERITS

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

NOW COMES the State of Texas, by and through Joe D. Gonzales, Criminal District Attorney of Bexar County, Texas, and the undersigned assistant criminal district attorney, with the filing of this motion asking the Court to extend the time for filing the State's Brief on the Merits in the above styled cause.

I. STATEMENT OF THE CASE

Appellant-Respondent was indicted for and convicted of possession with intent to deliver a controlled substance PG 1 4 grams to 200 grams under Bexar County cause number 2018-CR-6053. The Fourth Court of Appeals reversed the trial court's judgment on April 15, 2020 under cause number 04-19-00516-CR. The Fourth Court of Appeals subsequently denied the State's motion for rehearing on May 20, 2020. This Court granted the State's petition for discretionary review on October 21, 2020. The State's brief is due November 20, 2020. This is the State's first request for an extension.

II. REASONS FOR THE REQUEST

Undersigned counsel has recently filed briefs in the following cases: *In the Interest of A.F.*, 04-20-00216-CV (Fourth Court of Appeals, merits brief); *Ex Parte Juan Hernandez*, No. 04-20-00395-CR (Fourth Court of Appeals, merits brief) and *Ex Parte Tommie Carter*, No. 04-20-00396-CR (Fourth Court of Appeals, merits brief). Further, the undersigned counsel has substantially completed the brief and needs only a few additional days to file same. Counsel is requesting a ten day extension of time to accommodate the Thanksgiving holiday.

III. PRAYER

WHEREFORE, PREMISES CONSIDERED, Counsel for the State prays the Court grants an extension of time for an additional 10 days to file the brief on the merits in this case.

Respectfully submitted,

JOE D. GONZALES
Criminal District Attorney
Bexar County Texas

/s/ *Jennifer Rossmeier Brown*

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CERTIFICATE OF SERVICE

I, Jennifer Rossmeier Brown, certify that a copy of the foregoing motion has been emailed to Denny Callahan and the Office of the State Prosecuting Attorney on November 20, 2020.

/s/ *Jennifer Rossmeier Brown*

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Associated Case Party: Bexar County District Attorney's Office

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